

EXHIBIT 408

From: BILL WILSON <wssinc@verizon.net>
Sent: Thursday, January 17, 2008 2:44 PM
To: Ducca, Anita
Subject: rewrite

Anita,
Before I get too far along can you look at this and let me know if I am heading in the right direction?

DRAFT
Member questionnaire

What is your customer base?
Other distributors / retail pharmacies / hospitals / doctors / dentists / internet / pain clinics / veterinarians / other

DEA says "know your customer". What is your understanding of that statement and what as a company are you doing to meet that requirement?

What steps do you take before adding a new customer?
Credit check?
Do you complete any sort of background check? Is it your form?
Do you visit every customer location before commencing business? Photos?
Do you send a questionnaire to every customer before commencing business? Your form?
Do you do criminal background checking? Previous suppliers? DEA checking?
Do you conduct face to face interviews before commencing business? Documentation?
Do you conduct telephone interviews before commencing business? Documentation?
Do you check the DEA website or federal register for any actions against the customer?
Do you check the BOP accredited VIPPS for internet business?
Do you check the BOP accredited VAWD for distributor business?
Anything else you do before commencing business?

Based on whatever information you gather from the potential customer how do you handle discrepancies in the information or questions not answered, ie. questions on form left blank?

Do you feel what you are doing now should be sufficient?

Based on your customer base could you in fact do any of those additional steps?

Investigation documentation / records?

What other steps do you feel you should/could take if any?

After the customer is established with you do you conduct any other investigations?
Monthly / quarterly / annual review of the customer? Forms? Visits? Anything else?

Do you conduct cash sales of controlled substances?

In building a model for compliance what steps do you feel are essential to a good compliance program?

In building a model for compliance what steps do you feel you could not do based on your customer base?

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